

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CAPITAL CREDIT INCORPORATED,

Plaintiff,

v.

**MAINSPRING AMERICA, INC. and
AMAZON.COM SERVICES, INC.,**

Defendant.

Civil Action No. 1:19-cv-00797 - LY

**DECLARATION OF SARA RAWSON IN SUPPORT OF DEFENDANT AMAZON.COM
SERVICES, INC.'S MOTION TO DISMISS FOR LACK OF PERSONAL
JURISDICTION**

I, Sara Rawson, declare as follows:

1. I am over the age of 18 and competent to testify to the matters stated in this declaration. I have been employed by Amazon since 2016 and am currently a Litigation Paralegal. I make this declaration based on personal knowledge and Amazon's records generated, maintained, and relied upon in the ordinary course of its business.
2. Amazon.com Services, Inc. changed its name to Amazon.com Services LLC on December 30, 2019. Amazon.com Services LLC is a Delaware corporation with its principal place of business in Seattle, Washington.
3. I understand the Petition filed by Capital Credit Incorporated ("CCI") in this action alleges that Amazon withheld payment on invoices from Mainspring America, Inc. ("Mainspring") and is in possession of Mainspring's inventory. Because Amazon is managed from Amazon's Seattle headquarters, any relevant activities relating to the vendor agreement with Mainspring and the withholding of funds or inventory emanated from or were managed from Seattle.

4. Mainspring is a former Amazon vendor. Attached as **Exhibit A** is a true and correct copy of the operative Vendor Terms and Conditions entered into between Mainspring and Amazon, which Mainspring and CCI attached to their Arbitration Demand.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 24th day of March, 2020.



Sara Rawson

CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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DATED this 13th day of April, 2020.

/s/ Jonah Jackson